

February 25, 2004

Mr. John Stromme
Plant Manager
GAF Materials Corporation
P.O. Box 655607
Dallas, Texas 75265-5607

Re: Permit Amendment
Permit Number: 7711A
Asphalt Roofing Materials Manufacturing Facility
Dallas, Dallas County
Regulated Entity Number: RN100788959
Customer Reference Number: CN600474753

Dear Mr. Stevens:

Upon evaluation of the above-referenced amendment, we have determined that additional information is needed to complete our review. Please furnish the information indicated as follows:

A preliminary plantwide screen modeling to determine the off-property impacts of particulate matter by the Texas Commission on Environmental Quality (TCEQ) staff indicates that the emissions represented by GAF Materials for this facility do not comply with the state and federal regulations. Please provide a Table 1(a) and impacts analysis of all criteria pollutants (modeling for all emissions on the contiguous property) to demonstrate compliance with the state and federal regulations.

Also, please note that the TCEQ has an Internet site that has proven helpful to many air permit applicants. The site includes New Source Review Permit forms, tables, guidance documents, and state air regulations. The Web address is www.tnrcc.state.tx.us/permitting/airperm/.

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After receipt of all the additional information, we will continue the review of your application. If the information furnished in response to this notice results in the need for further clarification or additional information, we will communicate that need as soon as possible. Pursuant to Title 30 Texas Administrative Code § 116.116(a), all representations made in a permit application become conditions upon which a permit is issued. Any variations from these representations require prior authorization from the TCEQ.

Failure to submit all of the requested information within 30 days of the date of this letter may result in a voidance of your application. Following a voidance, the permit fee will be retained for 180 days. If you still wish to pursue the project following the voidance, you will need to submit a new Form PI-1 entitled "General Application for Air Preconstruction Permits and Amendments" and an entirely new application. The new application will be subject to the state and federal rules and regulations in place at the time of submittal, i.e., we will review state and federal applicability (best available control technology, netting, offsets, etc.). If public notice was required in the original application, you may be required to republish the notice. You do not need to submit additional fees with the new application if the project scope has not increased and the original fee was correct.

If a new Form PI-1 and new application are not submitted within 180 days from the date of the voidance, you will forfeit the original permit fee. A new Form PI-1, new application, and a new fee must be submitted if you desire to pursue the project beyond the 180 days.

Please reference the regulated entity number (RN), customer reference number (CN), and permit number noted in this document in all your future correspondence for the referenced facility or site. The RN replaces the former TCEQ account number for the facility (if portable) or site (if permanent). The CN is a unique number assigned to the company or corporation and applies to all facilities and sites owned or operated by this company or corporation.

Thank you for your cooperation in this matter. If you have any questions, please contact me at (512) 239-1351 or write to the Texas Commission on Environmental Quality, Office of Permitting, Remediation, and Registration, Air Permits Division (MC-163), P.O. Box 13087, Austin, Texas 78711-3087.

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Sincerely,

Earl J. Jones, P.E.
Air Permits Division
Texas Commission on Environmental Quality

EJJ/ssl

cc: Mr. David Miller, Section Manager, Air Pollution Control Program, City of Dallas
Environmental and Health Services, Dallas
Mr. Tony L. Walker, Air Section Manager, Region 4 - Fort Worth

Project Number: 83987

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AIR PERMITS DIVISION MC-163

MR JOHN STROMME
PLANT MGR
GAF MATERIALS CORP
PO BOX 655607
DALLAS TX 75265-5607